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March 15, 2013

Honorable Gary L. Sharpe  
United States District Court  
Northern District of New York  
445 Broadway  
Albany, New York 12207

Re: Mark R. Laskowski and Richard Hall v.  
Liberty Mutual Fire Insurance Company  
5:11-cv-340 (GLS/ATB)

Dear Judge Sharpe:

I am writing to respectfully request an adjournment in the above referenced case relative to two motions filed by the defendant. The purposes of the motions are to preclude plaintiffs' experts. These motions are returnable in your Court on April 4, 2013. I have contacted the other attorney, Mr. O'Connor, seeking an adjournment. Although he is not opposed in principle to the request, he does need to clear an agreement with his client.

I am seeking an adjournment because I need more time to review the motions and prepare responses. As this Court is aware, I filed my Notice of Appearance on February 25, 2013. I have had this case for less than a month. These are very substantial motions that weighs heavily on the issues in the case. I believe it is appropriate to grant me more time to be able to review the lengthy expert reports so that I can appropriately and prudently respond to these motions for my client.

I am requesting an adjournment for 31 days after the original return date of April 4, 2013, which would be May 6, 2013.

Additionally, I am respectfully requesting an adjournment of the trial into September or October for the same reason that this file is extremely extensive and proper preparation will take time. I also have a State Supreme Court trial scheduled to start Monday August 19<sup>th</sup> with will likely conflict with this case. Mr. O'Connor and I have discussed our mutual schedules for September and October and neither of us have trials scheduled.

Respectfully,

**KUEHNER LAW FIRM, PLLC**

A handwritten signature in blue ink, appearing to read 'K. P. Kuehner', is positioned above the printed name.

Kevin P. Kuehner

KPK:kd

cc: Thomas O'Connor, Esq.